

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROSE GINDEL TRUST, ROSE GINDEL, in her  
capacity as Trustee of the Rose Gindel Trust,  
MICHAEL GINDEL, individually and in his  
capacity as Trustee of the Rose Gindel Trust,  
BRENT GINDEL, in his capacity as Trustee of the  
Rose Gindel Trust, and ALVIN GINDEL, in his  
capacity as Trustee of the Rose Gindel Trust,

Defendants.

Adv. Pro. No. 10-04401 (SMB)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including November 15, 2019.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 11, 2019  
New York, New York

/s/ Nicholas J. Cremona  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Keith R. Murphy  
Email: kmurphy@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

/s/ Arthur Ruegger

DENTONS US LLP

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 768-6700

Facsimile: (212) 768-6800

Arthur Ruegger

Email: arthur.ruegger@dentons.com

*Attorneys for Defendants*

/s/ Deborah A. Reperowitz

Stradley Ronon Stevens & Young, LLP

100 Park Avenue, Suite 2000

New York, NY 10017

Telephone: (212) 812.4138

Facsimile: (646) 682.7180

Deborah A. Reperowitz

Email: dreperowitz@stradley.com

*Mediator*